

CASE NO. 8659
BELL ATLANTIC-MARYLAND, INC.
DATA REQUEST DATED AUGUST 30, 1994
TO
SBC MEDIA VENTURES, INC.

Note: All inquiries concerning this data request may be referred to Mark Armstrong, Director-External Affairs, (301) 294-7632.

29. Will SW Bell [sic] abide by the same LATA boundaries as those established for Bell Atlantic?

Answer: SBC-MV will abide by the LATA boundaries established by Judge Greene.

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30. What type of architecture will be used to provide fiber transmissions between Fiber Hubs and Remote Nodes? What type of protection schemes will be available in this section of the network, if any?

Answer:

The hub to node architecture will be a star configuration with backup fiber in the same sheath for protection switching.

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31. What type of backup facilities will be made available in the event of a major switch failure? or Digital Cross Connect System failure?

Answer:

SBC-MV has made preliminary plans for disaster recovery in the event of a major switch failure. Final plans will be put in place when a switch vendor is chosen. SBC-MV will have the necessary restoration procedures in place prior to providing service to Montgomery County.

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32. (a) What is your strategy for powering Network Interface Units and other line equipment inside a building? (b) What are the voltage, current and frequency levels that will be used in these locations? (c) Will they be in compliance with the National Electrical Code (NEC)?

Answer:

- a) Power will be delivered over the network.
- b) That information will depend on the vendor selected to supply our network equipment.
- c) Yes.

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33. Will your power supply equipment be distributed throughout the 500-home node, i.e., will more than one power supply be required to serve each 500-home node? If so, how many power supplies will be required to serve each 500-home node?

Answer:

The node powering strategy will be specific to the vendor's equipment. The two strategies under consideration are individually powering each 500 home node (including backup power) or multi node powering using the existing coaxial network. Reliability will be paramount in determining the final powering strategy.

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34. How many power supplies do you expect to employ throughout Montgomery County?

Answer:

The final system architecture will determine the number of nodes and powering requirements, therefore the number of power supplies we expect to deploy is unknown at this time.

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35. In a wide range commercial power outage that is experienced during a severe winter or summer storm, how many portable generators do you have and can you deploy enough to all node locations to provide reliable telephone service?

Answer:

SBC-MV will deploy a Bellcore-compliant network meeting the criteria described in TR-NWT-000057. This includes a minimum of 8 hours backup power for the network elements. SBC-MV currently has 36 generators to use in the event of a major power outage. Additional generators will be purchased as the network is deployed over the 5 year business plan.

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36. What voltage, current and frequency levels will your power systems be using on the coax network? Will the power being transmitted over the coax be in compliance with the National Electrical Safety Code (NESC)?

Answer:

The voltage, current and frequency levels of the power system in the new/upgraded network will be known when a network vendor is chosen. In any case, the network will be National Electric Code compliant.

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37. (a) Is it in your plans to employ any permanently mounted emergency generators for back-up power that may be located within the communities being served? (b) If so, what is the noise level (in decibels) that will be radiated from the generator? (c) What measures will be taken to ensure that these units will comply with County Ordinances for outdoor noise? (d) what type of fuel will these units require?

Answer:

- a) Yes.
- b) The vendor for that equipment has not been selected, therefore noise level is unknown. However, the noise level will conform with industry, OSHA and local government standards.
- c) SBC-MV will only choose equipment that complies with County Ordinances for outdoor noise.
- d) The vendor for that equipment has not been selected, therefore type of fuel is not known.

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38. (a) What type of batteries will be used for reserve power? (b) What measures will be taken to contain them if they should leak or explode during a catastrophic state?

Answer:

A vendor has not yet been selected, therefore, the exact battery type is not known at this time. However, the batteries that are deployed in the network will be enclosed in an environmentally protective housing. That housing will minimize the risk of contamination of the surrounding area should the battery leak or explode.

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39. (a) What measures will be taken to ensure that batteries will effectively carry the load when there is a loss of commercial power? (b) How will you ensure your battery plant will provide service for "a minimum of four hours" as stated in Mr. Reisner's June 10, 1994 testimony?

Answer:

- a) SBC-MV will design a preventative maintenance routine schedule, consistent with the chosen vendor's specifications, to test batteries to ensure they will effectively carry the load should an extended loss of commercial power be experienced.
- b) Mr. Reisner's June 10, 1994 testimony stated that network would be engineered for 4 hours of backup power. After further review of TR-NWT-000057, SBC-MV will deploy 8 hours of backup power to ensure greater network reliability. Backup power capacity may be just batteries, or batteries with installed emergency generation equipment. The exact configuration will depend on equipment selected and the power requirements at a given fiber hub or fiber node. Standard power engineering techniques will be used to ensure the power plant will provide 8 hours of backup power.

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40. What is your standard procedure for safely working on energized coax cable during a maintenance situation?

Answer:

While performing maintenance on energized coax cable, our technicians are required to wear and use all necessary and appropriate protective gear, including hard hat, safety glasses and rubberized work gloves.

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41. (a) Will power be transmitted over the service wire between the pole or pedestal and the house? (b) If so, what level of voltage and current will be used? (c) Will the power level be in compliance with the National Electrical Code (NEC)?

Answer:

- a) Yes.
- b) The precise level of voltage and current will not be known until a network vendor is chosen.
- c) Yes.

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42. Please provide a copy of all responses of SBC-MV to other parties' data requests.

Answer:

Attached, except as noted below, are the responses to People's Counsel Data Request No. 1, Staff Data Requests Nos. 1, 2, 3 and 4 and the MFS-I Data Request dated August 25, 1994.

Because of their highly proprietary nature, SBC-MV will not disclose the answers to the Data Request questions listed below to actual or potential competitors. Any potential relevance of such information to BA-Maryland is far outweighed by the potential harm to SBC-MV by its disclosure to a competitor. The answers SBC-MV will not disclose are:

- People's Counsel Data Request No. 1, Question 6.
- Staff Data Request No. 2, Questions 1, 2, 6, 10 (proprietary section) and 14(d).
- Staff Data Request No. 3, Questions 2, 3, 4, 5, 9(b) and 10.

REGULATORY

Rochester Tel plan gets PSC approval

The New York Public Service Commission approved Rochester Telephone's pioneering open markets plan and a corporate restructuring late last week in a groundbreaking decision likely to turn the Rochester, N.Y., market into a national testing ground for local competition.

The move follows approval of the plan by an administrative law judge this past summer. Under the plan, which goes into effect in January 1995, Rochester Tel will open its 900,000-line network in the Rochester area to full competition, with competing carriers gaining physical interconnection, local number portability and access to all Rochester Tel databases. Time Warner/AxS of Rochester and ACC of Rochester already have been certified by the New York PSC to compete in the Rochester market.

For its competitive risk, the incumbent carrier will gain freedom from traditional earnings cap and rate-of-return regulation. Rochester Tel also will be allowed to bundle local, long-distance and wireless services for its customers.

The carrier's restructuring will allow it to split operations between a competitive company pricing services according to market conditions and a network company providing unbundled network access and other features.

Dan O'Shea

COMPETITION

Trio to test telephony over cable

Teleport Communications Group, Tele-Communications Inc. and Motorola Inc. announced plans late last week to launch the first U.S.-based technical trial of telephony over a cable network.

The six-month test, which will begin in March, will involve 25 employees from each company who live in Arlington Heights, Ill., a suburb of Chicago. The trial eventually may expand to the businesses and residences in Arlington Heights, where TCI serves approximately 18,000 customers, and could lead to commercial service rollout.

TCI and partner U S West provide residential users in the U.K. with both cable and telephony service, but the services are delivered separately via twisted pair and coaxial cable. In this trial, both services will be delivered over one coax drop, said Bruce Ravenel, senior vice president and chief operations officer for technology ventures at TCI.

Telephony will be transmitted over TCI's network using Motorola's CableComm system

equipment, which consists of interfaces at the customer premises and where the cable network's headend connects to the TCG network. TCG will switch the calls and carry them to long-distance carriers' points of presence or terminate them on other local exchange carrier networks. The trial will be the first application of Motorola's CableComm technology.

Because arrangements for number portability in the local exchange have not yet been hammered out in Illinois, participants will be assigned new phone numbers for the trial, said Bob Annunziata, president and CEO of New York-based TCG. Once the technology has proven itself, TCG will pursue similar ventures with its other cable TV partners, Annunziata said. Those partners include Comcast Corp., Cox Cable Communications Inc. and Continental Cablevision Inc.

Time Warner has broken off talks that would have led it to invest in the competitive access provider.

Annie Lindstrom

OCT 19 1994

RELATIONSHIP

Cable & Wireless signs agreement with Bellcore

Cable & Wireless announced last week that it had signed a memorandum of understanding with Bellcore for access to the technology of the research and development arm of the Bell regional holding companies.

Under the agreement, each member of the C&W federation may negotiate for other telecom consulting services, including the licensing of Bellcore technology. The agreement sets the stage for future work between Bellcore and C&W but does not regard any specific services or technology.

C&W said it entered the relationship because it was interested in Bellcore's expertise in systems software, and advanced telecommunications such as intelligent networking, radio systems and multimedia.

C&W said this new relationship would complement its existing bond with Bell-Northern Research, whose strength lies in equipment, hardware and associated software development.

Although Bellcore is the R&D arm of the RHCs, it continues to increase its activities to provide technology to outside

companies both domestically and abroad.

"We have the ability to work with other companies like C&W entirely on our own. We don't need owner approval or sponsorship of that work," said George Via, corporate vice president of customer solutions at Bellcore.

Paula Bernier

FOREIGN TRIAL

Fujitsu, FPN team for trial

First Pacific Networks Inc.'s FPN1000i system has been chosen by Fujitsu Ltd. and Tomen Corp. to provide trial telephone service in Japan, the vendor announced last week. The installation will mark the first residential deployment of telephony over cable in Japan, according to the companies. Deployment started this week.

The equipment will provide service to 300 residences on Yokohama TV Corp.'s 11,000 subscriber hybrid fiber/coax network. Subscribers will be charged during the trial, although pricing has not been announced.

Fujitsu and Tomen, a major trading company, will fund the test. Results will be shared among the four companies.

Paula Bernier

CROSSTALK

This week's channel chatter

ON-LINE

Cellular square-dancing
In their rush to offer personal communication services, the players are reportedly going round and round in their attempts to get in step with the right partners.

Directory assistance

Forget about 555-1212. Long-distance carriers are pushing forward with plans to make it increasingly easy to find the number of your desire through 800 numbers.

OFF-LINE

Video dial tone rule reconsideration
We're still waiting!

ISDN

The integrated services digital network suffered from a case of stage fright at last week's USTA convention. Two of three videoconference participants were connected with much popping and hissing, but a third had to be connected via broadcast video.

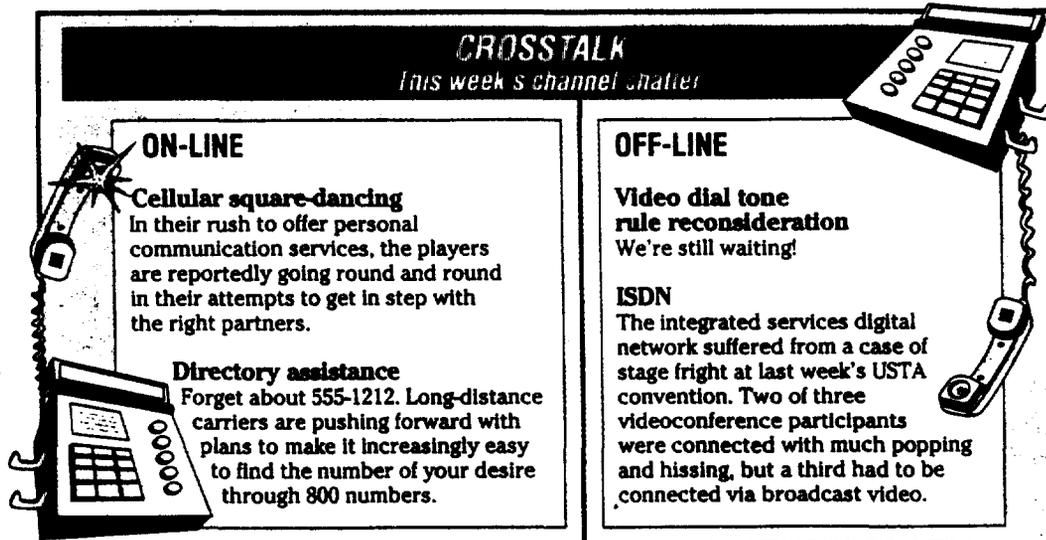


EXHIBIT 2

Bell Atlantic - Maryland, Inc.
1 East Pratt Street - 8E
Baltimore, Maryland 21202-1038
410 393-7725
FAX 410 393-4078

Randal S. Milch
Vice President and General Counsel

March 2, 1995

Mr. Daniel P. Gahagan
Executive Secretary
The Maryland Public Service Commission
6 St. Paul Centre
Baltimore, Maryland 21202-6806

Re: Case No. 8584, Phase II

Dear Mr. Gahagan:

On behalf of Bell Atlantic - Maryland, Inc. (BA-MD) and MFS Intelenet - MD, Inc. (MFS-I), I wish to inform you that BA-MD and MFS-I have agreed to conduct a joint cooperative test on loop unbundling. The aim of the test is to identify and develop the administrative, operational and technical procedures associated with provisioning a voice-grade, analog, unbundled loop.

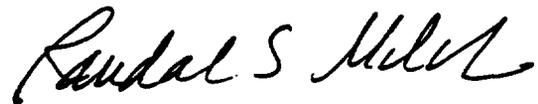
The test will be conducted at the BA-MD Charles Street central office in Baltimore. MFS-I will utilize its virtual collocation node at 323 Charles Street to interconnect with BA-MD provided unbundled local loops. The test may be expanded to include additional BA-MD collocation central offices to test various loop lengths and configurations.

Although BA-MD and MFS-I are still finalizing the scope and timetable associated with various segments of the test, mutual agreement has been reached on a common definition of an unbundled loop and the applicable industry standards. Depending on the outcome of each segment, the unbundled loop test is now expected to conclude by 6/1/95. At the conclusion of the test, BA-MD and MFS-I will jointly file a report to the Commission detailing the results.

Through the test, BA-MD and MFS-I expect to gain a clearer and comprehensive understanding of the processes/functions and associated costs involved in loop unbundling. Accordingly, neither BA-MD nor MFS-I intend at this time to file Direct testimony (March 15, 1995) in Case No. 8584, MFS Phase II, on the technical and operational issues associated with loop unbundling. MFS-I reserves the right to file direct testimony on unbundled loop pricing and related issues, and BA-MD reserves the right to respond to such testimony as may be appropriate.

Russell Blau, Attorney for MFSI-MD, has reviewed and approved this letter. If you have any questions, please do not hesitate to contact me on 410-393-7725.

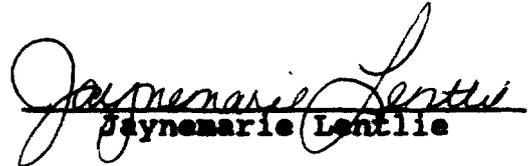
Very Truly Yours,



cc: All Parties of Record
All Interested Persons
Chairman Frank O. Heintz
Commissioner Claude M. Ligon
Commissioner E. Mason Hendrickson
Commissioner Susanne Brogan
Commissioner Gerald L. Thorpe

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Bell Atlantic" was served this 10th day of April, 1995 by first class mail, postage prepaid, on the parties on the attached list.


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